

Vermont Grocers' Association, Inc.

Serving the food industry of Vermont since 1934

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James Harrison
President

March 19, 1992

OSHA
DOCKET OFFICER
MAR 20 1992

DATE

TIME

Occupational Safety and Health Administration
Indoor Air Quality Review
Docket Number H-122, Room N-2625
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, D.C. 20210

Dear OSHA Indoor Air Quality Review Panel:

As president of the Vermont Grocers' Association, I would like to offer comments on the issue of indoor air quality in the workplace. Specifically, I will direct my comments to our concern that any federal regulation of indoor air quality take into consideration the potential costs of implementation to employers.

Our organization represents people who own or operate retail grocery stores throughout the State of Vermont. Our members must accommodate customers as well as ensure a clean and safe workplace environment for employees. Maintaining adequate indoor air quality is, of course, an important way of achieving these goals.

Currently, we are bound by no government regulations for maintaining indoor air quality. Each operator takes responsibility for air quality in his or her own establishment. Because we are in the retail business, where customer satisfaction determines success or failure, it is to a store owner's advantage to keep a store that is as clean and comfortable as possible. It could be said that we have a powerful economic incentive to maintain the quality of our indoor air and that is probably one reason why unhealthy air does not pose a problem among our members. However, we do recognize that other workplace environments, including climate-controlled office buildings and factories, may have air quality problems that need to be addressed.



As we understand the issue, improper ventilation is associated with many workplace air quality problems. As employers who would be compelled to comply with any standards adopted by OSHA we urge that OSHA focus its investigation on reasonable ways in which ventilation can be improved and emphasize that the Agency make the cost burden on business a central consideration.

Our members are operating in the deepest economic recession to hit New England since the Depression. Costly government regulations would be a real hindrance to our ability to operate in the current economic climate. We hope that any regulations, if deemed necessary, would include a generous timetable for implementation and prescribe realistic standards rather than methods of meeting those standards.

The Vermont Grocers' Association supports OSHA in its goal of guaranteeing that the air in the nation's workplaces is clean and healthy. However, we hope that the Agency will take into consideration the economic viability of any regulations considered.

Sincerely,



James Harrison